

UNITED STATES DISTRICT COURT
for the
Southern District of Ohio

United States of America)
v.)
Kingsley Bonsu) Case No. 1:22-MJ-00065
)
)
)
)
)

Defendant(s)

CRIMINAL COMPLAINT

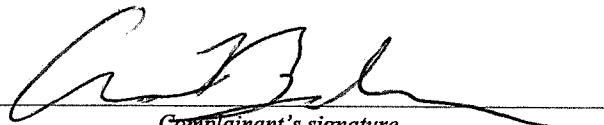
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of (various dates in 2020 and 2021) in the county of Butler in the
Southern District of Ohio, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC 1001	False Statements

This criminal complaint is based on these facts:
Please see attached affidavit.

Continued on the attached sheet.


Complainant's signature

Special Agent Aaron Bauder
Printed name and title

Sworn to before me and signed in my presence.
via electronic means, specifically Facetime video.

Date: Jan 28, 2022


Judge's signature

City and state: Cincinnati, Ohio

Hon. Stephanie K. Bowman, U.S. Magistrate Judge
Printed name and title



AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Aaron Bauder, a Special Agent with the Federal Bureau of Investigation, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION

1. I have been employed as a Special Agent with the Federal Bureau of Investigation (hereafter FBI) since 2019, and am currently assigned to the White Collar Crimes Squad of the Cincinnati Field Office. In this capacity, I investigate white collar crimes, including civil rights violations, money laundering, and various types of fraud. Since 2019, I have received training and experience in interview and interrogation techniques, arrest procedures, search warrants, and various other investigative techniques.

2. As an FBI Special Agent, I am responsible for enforcing, and for investigating violations of United States laws dealing with financial fraud, including violations within the meaning of Section 2510(7) of Title 18, United States Code, that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code.

3. The facts in this Affidavit are based on my personal knowledge as well as on information I learned from other sources, including law enforcement databases, reports prepared by other law enforcement officers, and conversations I have had with other law enforcement officers and witnesses involved in this investigation. Because I am submitting this affidavit for the limited purpose of securing a criminal complaint and arrest warrant, I have not included every fact that I know about this investigation; I have set forth only those facts that I believe are necessary to establish probable cause.

4. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 1001 (False Statements, Concealment) have been committed by Kingsley Bonsu (hereafter “Bonsu”).

II. INVESTIGATION AND PROBABLE CAUSE

5. The purpose of the Small Business Administration (“SBA”) Paycheck Protection Program (“PPP”) loan is to provide monetary assistance for businesses to keep their workforce employed during the Coronavirus (hereafter “COVID-19”) crisis. The SBA PPP loan program was established by the 2020 United States Federal government Coronavirus Aid, Relief, and Economic Security Act (CARES Act) to help certain businesses, self-employed workers, sole proprietors, certain nonprofit organizations, and tribal businesses continue paying their employees. The SBA PPP allows entities to apply for low-interest private loans to pay for their payroll and certain other costs. The loan proceeds may be used to cover payroll costs, rent, interest, and utilities.

6. Bonsu is a Ghanaian immigrant and Permanent Resident of the United States, who currently resides in Fairfield, Ohio 45014. Bonsu owns or claimed to be the owner of multiple LLCs to include “Infinite Management Agency LLC”. During this criminal investigation and a comprehensive review of Bonsu’s bank records, it became known that Bonsu received multiple SBA PPP loans. The following example outlines how Bonsu applied for and utilized SBA PPP loans for one of his multiple LLCs:

Infinite Management Agency LLC

7. Registration of “Domestic For-Profit Limited Liability Company” for business “Infinite Management Agency LLC” (hereafter “Infinite”) was filed by Bonsu to the State of Ohio Secretary of State and effective on February 1, 2014. On December 13, 2014, Bonsu changed the registered address of the business to ADDRESS-1 in Fairfield, Ohio 45014.

8. Bonsu applied for, and received the following PPP loans on behalf of Infinite:

Business Name	Application	Financial Institution Applied to	\$ Requested	\$ Disbursed
<i>Infinite Management Agency LLC</i>	5/18/2020	<i>Celtic Bank via BlueVine Capital</i>	46,875.00	(Denied)
Infinite Management Agency LLC	6/18/2020	Northeast Bank	46,800.00	46,800.00
<i>Infinite Management Agency LLC</i>	1/19/2021	<i>ACAP + Loansource</i>	41,667.00	(Denied)
Infinite Management Agency LLC	3/3/2021	Lebanon Citizens National Bank (LCNB)	41,500.00	41,500.00
Total			176,842.00	88,300.00

9. An open-source internet search conducted for “infinite management agency” showed limited results. No active website for the business could be located. A Facebook page was found for Infinite, indicating limited activity and 28 followers. The page had only one post since May of 2015. No description of the business could be found, but Infinite was listed as an “Entertainment Agency” category on the page. The company’s logo listed on Facebook read, “Infinite Management Agency Entertainment”. The company’s website was listed as “infinitemgmtagency.com” but was not a working website.

Infinite: Loan Application to Northeast Bank

10. Bonsu applied for an SBA PPP loan on behalf of Infinite on June 18, 2020 with Northeast Bank. Bonsu was required to submit multiple forms of identification with his loan application. A review of the loan application file showed that he submitted a photograph of his United States Permanent Resident Card USCIS# XXX-XXX-628 and his Ohio Driver’s License DL#XXXX0355.

11. On the application, Bonsu listed himself as the owner of Infinite. Bonsu falsely answered “No” when asked, “Is the Applicant or any owner of the Applicant an owner of any other business, or have common management with, any other business?” In reality, Ohio Secretary of State records reflect that Bonsu has registered other businesses. In fact, on May 12, 2020—about a month before the Infinite loan application—Bonsu applied for an SBA PPP loan on behalf of another business named Ticketvow LLC. On that application, Bonsu listed himself as the owner of Ticketvow LLC.

12. According to the Infinite loan application file, Bonsu claimed to employ five individuals at Infinite in 2019. He claimed to have a monthly payroll of \$18,750. On the application, Bonsu certified, “The funds will be used to retain workers and maintain payroll or make mortgage interest payments, lease payments, and utility payments, as specified under the Paycheck Protection Program Rule.”

13. Bonsu was approved for SBA Loan #XXXXXX8002, and a loan for \$46,800 was deposited into his JP Morgan Chase bank account number XXXXXX3801 on July 6, 2020. JP Morgan Chase bank account number XXXXXX3801 is a business checking account for Infinite. Bonsu is the sole signer on the account. On July 6, 2020, when the \$46,800 was deposited, there was a balance of -\$10.00 in the account. By July 30, 2020, there was a balance of -\$20.00 in the account. A review of the financial records showed spending behavior that was not in accordance to SBA PPP loan guidelines. Bonsu made multiple cash withdrawals and purchases that appear unrelated to business and payroll expenses. As seen below, the funds were primarily spent on “Copart”, an auto-auction company. Substantial amounts were also transferred to Ticketvow, which is another company that Bonsu owns. In addition, Bonsu withdrew a substantial amount of the loan proceeds in cash. The chart below indicates examples as to how the money from the PPP loan disbursement was spent:

Row Labels	Sum of Credit	Sum of Debit	Sum of Txn Amt
Northeast Bank	46,800.00		46,800.00
Fee		(15.00)	(15.00)
USPS		(26.35)	(26.35)
Cashier's Check Fee		(32.00)	(32.00)
A1Ofmiami Eba		(209.99)	(209.99)
Autoparts		(443.01)	(443.01)
Shadow Creek Apartments		(1,000.00)	(1,000.00)
unknown Wave Recipient		(750.00)	(750.00)
Cash		(2,000.00)	(2,000.00)
Kingsley Bonsu		(5,700.00)	(5,700.00)
Ticketvow		(10,098.65)	(10,098.65)
Copart		(26,493.00)	(26,493.00)
Grand Total	46,800.00	(46,768.00)	32.00

The bank records do not indicate that any loan proceeds were used to pay the five alleged employees of Infinite.

Infinite: Loan Application to Lebanon Citizens National Bank

14. Bonsu applied for an SBA PPP loan on behalf of Infinite on March 3, 2021, with lender Lebanon Citizens National Bank (hereafter LCNB). Bonsu was required to submit multiple forms of identification with his loan application. A review of the loan application file showed that he submitted a photograph of his United States Permanent Resident Card USCIS# XXX-XXX-628 and his Ohio Driver's License DL#XXXX0355.

15. On the application, Bonsu listed himself as the owner of Infinite. Bonsu falsely answered "No" when asked, "Is the Applicant or any owner of the Applicant an owner of any other business, or have common management (including a management agreement) with any other business?" In reality, Ohio Secretary of State records reflect that Bonsu has registered other businesses. In fact, on May 12, 2020, Bonsu applied for an SBA PPP loan on behalf of another business named Ticketvow LLC. On that application, Bonsu listed himself as the owner of Ticketvow LLC.

16. According to the Infinite loan application file, Bonsu's average monthly payroll was \$16,600.

17. As a part of his application, Bonsu also submitted a falsified bank statement to LCNB in order to secure the loan. The falsified statement makes it appear that Bonsu paid certain employees. In reality, the bank account did not even exist on the dates specified on the falsified statement. A copy and breakdown of the statement is shown below:

* Bank Statement as provided by Lebanon Citizens National Bank as part of
PPP Loan Application for Infinite Management Agency LLC.

CHASE

JPMorgan Chase Bank, N.A.
P O Box 182051
Columbus, OH 43218-2051

Per Signature Card, this account was
not in existence until 06/25/2020.

February 01, 2020 through February 29, 2020
Account Number: 3801

00143138 DRE 001 142 30520 NNNNNNNNNNN T 1000000000 63 0000
INFINITE MANAGEMENT AGENCY LLC
FAIRFIELD OH 45014-

CUSTOMER SERVICE INFORMATION

Web site: Chase.com
Service Center: 1-800-242-7338
Deaf and Hard of Hearing: 1-800-242-7383
Para Espanol: 1-888-622-4273
International Calls: 1-713-262-1679



CHECKING SUMMARY

Chase Total Business Checking

Misspelling of business, font is not
lining up correctly.

	INSTANCES	AMOUNT
Beginning Balance		19,300.32
Deposits and Additions	3	0.00
ATM & Debit Card Withdrawals	0	0.00
Electronic Withdrawals	5	-16,723.44
Fees	1	-34.00
Ending Balance	9	\$2,542.88

Item shows 3 Deposits and Additions, however,
there is no value, below we see three deposits for
a total of \$27,850.00

1- Does not agree to ending balance in daily
summary on page 2.

DEPOSITS AND ADDITIONS

DATE	DESCRIPTION	AMOUNT
02/10	Deposit 10044212500	3,750.00
02/19	Deposit 71212021979	6,100.00
02/23	Deposit 92863205118	18,000.00

Total Deposits and Additions

\$27,850.00



February 01, 2020 through February 28, 2020
Account Number: [REDACTED] 3801

ELECTRONIC WITHDRAWALS

DATE	DESCRIPTION	AMOUNT
02/03	Quickpay Payment To B Acheampong Jpm294857285673	3,230.86
02/03	Quickpay With Zelle Payment To K Bonsu 50493058629	3,230.86
02/03	Quickpay With Zelle Payment To S Mensah Jpm394094968329	3,230.86
02/03	Quickpay With Zelle Payment To B Mills 50682948592094	3,230.86
02/03	Quickpay With Zelle Payment To AB Accounting LLC 40694838687573	3,800.00
Total Electronic Withdrawals		\$16,723.44



FEES

DATE	DESCRIPTION	AMOUNT
02/26	ACH Payment Service Charge RR - Details: 52636049672	\$34.00
Total Fees		\$34.00

The monthly service fee of \$15.00 was waived this period because you maintained a minimum daily balance of \$1,500.00 or more.

DAILY ENDING BALANCE

DATE	AMOUNT
02/03	-2,542.88
02/10	6,292.88
02/19	12,392.88
02/23	30,392.88
02/26	30,358.88

These daily ending balances do not agree to what would be calculated using the above information. The calculated balance would be as follows:

1- Does not agree to Checking summary on page 1.

Date	Transactions	Daily Ending Balance
2/1/2020		18,300.82
2/3/2020	(16,723.44)	2,576.88
2/10/2020	3,750.00	6,326.88
2/19/2020	6,100.00	12,426.88
2/23/2020	18,000.00	30,426.88
2/26/2020	(34.00)	30,392.88

SERVICE CHARGE SUMMARY

TRANSACTIONS FOR SERVICE FEE CALCULATION

Checks Paid / Debits	5
Deposits / Credits	0
Deposited Items	3
Transaction Total	8

NUMBER OF TRANSACTIONS

SERVICE FEE CALCULATION	AMOUNT
Service Fee	\$15.00
Service Fee Credit	-\$15.00
Net Service Fee	\$0.00
Excessive Transaction Fees (Above 100)	\$0.00
Total Service Fees	\$0.00

18. Bonsu was approved for SBA Loan #XXXXXX8505, and a loan for \$41,500 was deposited into his Infinite JP Morgan Chase bank account number XXXXXX3801 on March 9, 2021. As reference by the previous loan disbursement, funds for this disbursement were also used improperly, and not in accordance with SBA PPP loan guidelines. Below indicates examples of how the money was spent:

Row Labels	Sum of Credit	Sum of Debit	Sum of Txn Amt
LCNB	41,500.00		41,500.00
Beginning balance	3.64		
Cashier's Check Fee		(8.00)	(8.00)
Fee		(15.00)	(15.00)
Marathon		(23.28)	(23.28)
Naomis Garden		(32.50)	(32.50)
Giardino Restaurant		(33.03)	(33.03)
Doordash		(85.35)	(85.35)
Lyft		(99.18)	(99.18)
Champagnecl		(106.68)	(106.68)
Ebay		(148.02)	(148.02)
Cerveceria Del Barr		(150.00)	(150.00)
Giannis Restaurant		(160.00)	(160.00)
AT&T		(165.00)	(165.00)
Shein_Com London		(203.83)	(203.83)
Unknown Wave Recipient		(358.96)	(358.96)
Lydia Adumtumwa		(500.00)	(500.00)
Snaptravel Royal Palm		(755.94)	(755.94)
Car Connection		(1,500.00)	(1,500.00)
Kevin Nkrumah		(2,000.00)	(2,000.00)
Amazon		(2,327.52)	(2,327.52)
Hyatt Centric Miami		(3,695.33)	(3,695.33)
Shadow Creek Apartment		(5,000.00)	(5,000.00)
David Kwame Owusu		(9,800.00)	(9,800.00)
Kingsley Bonsu		(15,000.00)	(15,000.00)
Grand Total	41,503.64	(42,167.62)	(667.62)

19. In his application, Bonsu claimed to employ the following four individuals at Infinite in 2020, each earning \$50,000 that year:

1. "B.A.", Social Security Number (hereafter SSN) XXX-XX-4238
2. Kingsley Bonsu, SSN XXX-XX-8789

3. "B.M.", SSN XXX-XX-3914

4. "S.M.", SSN XXX-XX-4368

20. The authentic JP Morgan Chase bank records do not reflect any payroll payments to B.A., B.M., or S.M. Moreover, as explained below, these people were apparently not employed by Infinite in 2020, contrary to what Bonsu claimed in the loan application.

21. B.A. is known to the FBI, and on June 23, 2021, an FBI Agent contacted him in an attempt to schedule an interview related to fraud. FBI Agents attempted to schedule an interview through an attorney, but prior to the meeting, B.A. traveled to Ghana. According to travel records, B.A. flew to Ghana on July 4, 2021, and has not returned to the United States as of January 25, 2022.

22. On August 2, 2021, Special Agent (SA) Michael D. Reigle and your Affiant interviewed B.M. at his residence. He advised that he and Bonsu had a close personal relationship around 2013, when he believed Bonsu worked as a "promoter". The two are no longer close, however, and he had seen Bonsu a few times since 2013. B.M. knew that Bonsu is involved in buying and selling cars but was unaware of any specific businesses that Bonsu has owned or currently owns.

23. On July 1, 2021, your Affiant interviewed S.M. She advised that she and Bonsu previously had a romantic relationship and that the two had lived together in Fairfield, Ohio, from approximately February of 2019, to January of 2020. She explained that Bonsu was involved in a variety of fraud. She recalled that when she and Bonsu were living together, she reported him to the Fairfield Police Department for criminal activity regarding the credit card theft. According to S.M., Bonsu stole one of her credit cards in order to purchase a plane ticket to Ghana. The two subsequently separated and she moved to another state.

24. On July 1, 2021, your Affiant confirmed with the Fairfield Township Police Department that S.M. had filed a police report on November 21, 2019. A review of the report

showed that on November 20, 2019, S.M. was contacted by her bank, PNC, and told that a payment of \$1684.95 had been paid from her account to Delta Airlines. She suspected that Bonsu had used her credit card information to purchase a plane ticket for his travel to Ghana. At the time, she also suspected Bonsu to be involved in other credit card related fraud.

Interviews of Bonsu's Family Member and Bonsu

25. On July 26, 2021, SA Michael D. Reigle and your Affiant interviewed "R.A." at her residence in Fairfield, Ohio, the address to which Infinite is registered. R.A. is an immediate family member of Bonsu, and periodically a co-habitant with him at the aforementioned residence. R.A. was unsure of exactly what Bonsu does for employment, but knew that he is involved in selling and buying cars. R.A. believed that Bonsu may own a business investment company, because he still receives mail for Infinite at ADDRESS-1 in Fairfield, Ohio. Aside from him receiving mail at that address, R.A. advised that she would have no knowledge of him owning a business. Bonsu does not conduct any business or business-related activity from the house at ADDRESS-1 in Fairfield, Ohio. R.A. had no additional knowledge of Infinite. R.A. had no knowledge of Bonsu receiving any Paycheck Protection Program (PPP) funds for any of his alleged businesses.

26. On July 18, 2021, Bonsu was interviewed by SA Michael D. Reigle in the parking lot of his apartment complex. Prior to the interview, multiple unsuccessful attempts to schedule an interview with Bonsu had been made. Your Affiant reviewed the report and spoke in person about the interview with SA Reigle. Bonsu was advised that the interview was completely voluntary, and that lying to an FBI Agent is a crime.

27. Bonsu advised that he had three businesses, one of which was Infinite. He explained that he received approximately \$40,000 in SBA PPP loans from LCNB for Infinite. He

explained that Infinite is involved with concerts, and is a company that organizes paint and phone parties, which involve paint or phones being shot out of a cannon during a concert.

28. Bonsu advised that Infinite has the following four employees, which are different than the names found on his loan application:

1. "D.S."
2. *Shannon Last Name Unknown (LNU)*
3. *Two other individuals that were replaced, who Bonsu could not recall*

29. Bonsu was unable to provide supporting documentation for Infinite at the time of the interview, and claimed the documents were located in a backpack inside of a Cadillac at someone else's residence.

30. According to travel records, Bonsu flew out of the US and into Ghana on August 1, 2021. He returned to the US on November 12, 2021.

III. CONCLUSION

31. Based on the forgoing, I request that the Court issue the proposed criminal complaint. There is probable cause to believe that violations of 18 U.S.C § 1001 (False Statements, Concealment) have been committed by Kingsley Bonsu. I, therefore, respectfully request that an arrest warrant be issued authorizing the arrest of Kingsley Bonsu.

Respectfully submitted,



Aaron Bauder
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on this 28 day of January, 2022.
via electronic means, specifically Facetime video.

Stephanie K. Bowman
Honorable STEPHANIE K. BOWMAN
UNITED STATES MAGISTRATE JUDGE

